

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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CATHERINE DEEGAN PATTERSON,  
Individually and as she is the  
Administratrix of the Estate of  
Edward "Teddy" Deegan,  
and YVONNE DEEGAN GIOKA,  
Plaintiffs,

CIVIL ACTION NO. 04-11817 JLT

v.

\_\_\_\_\_  
UNITED STATES OF AMERICA  
and DENNIS CONDON  
Defendants  
\_\_\_\_\_

**PLAINTIFFS' MOTION FOR AN EXTENSION OF TIME TO FILE AN  
OPPOSITION TO THE MOTION TO DISMISS OF THE  
DEFENDANT UNITED STATES OF AMERICA**

Now come the plaintiffs, Catherine Deegan Patterson, Individually and as she is the Administratrix of the Estate of Edward "Teddy" Deegan, and Yvonne Deegan Gioka, and request an enlargement of time in which to file their opposition to the defendant's motion to dismiss up to and including January 7, 2005.

This is a wrongful death case arising out of the death of Edward "Teddy" Deegan. Plaintiffs allege that the FBI was responsible for Deegan's death.

The defendant United States of America has filed a motion to dismiss, including extensive documentation and a legal argument.

The motion was mailed to plaintiffs' counsel on November 22, 2004.

At the time that plaintiffs' co-counsel, Neil Rossman and Paul F. Denver, received the motion, they were preparing for a trial which commenced on November 29 in the Suffolk Superior Court and which will, in all probability extend through the week of December 13. For this reason, plaintiffs' counsel have not been able to address the

motion and do the necessary preparation in order to file a response and will not be able to turn their attention to the motion until the week of December 20. Given the approach of the holidays, counsel respectfully request that the Court extend the period within which the plaintiffs may oppose the motion through January 7, 2005. Granting this motion will not in any way prejudice the defendant, but will afford the plaintiffs a reasonable opportunity to oppose the dispositive motion.

Respectfully submitted,  
Plaintiffs,  
By their attorneys,



Neil Rossman, BBO#430620

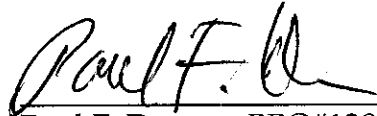


Paul F. Denver, BBO#120755  
Rossman & Rossman  
Marketplace Center – North  
200 State Street  
Boston, MA 02109  
(617) 439-9559

DATED: December 6, 2004

**CERTIFICATE OF SERVICE**

I, Paul F. Denver, do certify that on this 6<sup>th</sup> day of December, 2004, the attached **Plaintiffs' Motion for an Extension of Time to File an Opposition to the Motion to Dismiss of the Defendant United States of America** was forwarded to Bridget Bailey Lipscomb, Trial Attorney, Torts Branch, Civil Division, U.S. Department of Justice, Benjamin Franklin Station, P.O. Box 888, Washington, D.C. 20044, attorneys for the United States of America, by first class mail, postage prepaid.

A handwritten signature in black ink, appearing to read "Paul F. Denver", is written over a horizontal line.

Paul F. Denver, BBO#120755  
Rossman & Rossman  
Marketplace Center - North  
200 State Street  
Boston, MA 02109  
(617) 439-9559